

EXHIBIT C

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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF ARIZONA

3
4 IN RE: BARD IVC FILTERS

5 PRODUCTS LIABILITY NO. MD-15-20641-PHX-DC
6 LITIGATION.

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8 Deposition of DARREN ROBERT HURST, M.D.,
9 Witness herein, called by the Defendants for
10 cross-examination pursuant to the Rules of Civil
11 Procedure, taken before me, Lisa M. Conley
12 Yungblut, a Notary Public within and for the State
13 of Ohio, at the offices of Mike Mobley Reporting,
14 312 Walnut Street, Suite 1600, Cincinnati, on
15 Friday, the 21st of July, 2017, at 8:01 a.m.
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1 Okay. Bear with me just a second. Okay.

2 Q. And will we be able to print this one
3 out at a break too?

4 A. I think I can, yeah, I think. I'll
5 have to make a copy of it. Yeah, we can do it at
6 a break.

7 MR. O'CONNOR: Can you just identify
8 what we're looking at right now?

9 THE WITNESS: Yes. This is the CT
10 scan.

11 BY MR. NORTH:

12 Q. From 1/5/17?

13 A. Thank you, 1/5/17. This is the IVC
14 filter, okay?

15 Q. Right.

16 A. This is the normal appearance of a
17 stabilization arm, okay?

18 Q. Yeah.

19 A. You can see that this stabilization
20 arm right here is truncated. Okay. I'm going to
21 go through the images to show you just so you
22 understand. So that's the first image. Second
23 image, there's the truncated arm and then there's
24 no arm. That arm right there is shortened and
25 that -- took cross-sectional images as well, and I

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1 can show you a rib film that shows you that that
2 is fractured and that strut is no longer the
3 length that it's supposed to be. So that fragment
4 is gone.

5 Q. You're not able to say where that
6 fragment is located, correct?

7 A. No. I think it went into the GI
8 tract, to be honest, because initially that strut
9 was penetrating -- or penetrating in through the
10 inferior vena cava wall and adjacent to the
11 duodenum. And we can go back to the original CT
12 scan, if we want, that shows that strut when it
13 was still intact.

14 Q. There's no need to do that.

15 A. Okay. I want to make a copy of this
16 so I can do -- I want to do this real quick.

17 Q. Can I show you -- and this has been
18 already marked on the flash drive as Exhibit 12,
19 and this is the first image of that. Can you look
20 at that?

21 A. Oh, yeah.

22 Q. That's the image -- one of the images
23 you were talking about, right?

24 A. Yeah, yeah, that's it.

25 MR. O'CONNOR: Can you put it into

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1 Q. But these have been marked as Exhibit
2 12. So we still don't have a No. 11, but we'll
3 find one.

4 A. Is 11 the --

5 Q. Oh, yes, 11 -- that fits perfectly,
6 then. 11 is the one that you showed me.

7 A. With the migration or do you want to
8 use this one I'm making right now, the same
9 picture that you just showed me? Sagittal view
10 CT, you want that?

11 Q. Yeah, yeah.

12 A. Got it, done.

13 Q. All right. So it's your supposition
14 that the fractured strut, if one existed, migrated
15 into the GI tract and she probably passed it?

16 A. Yes, sir.

17 Q. How can you be certain that that
18 truncated arm, as you describe it, is not simply
19 just the view of it that's not showing the full
20 length of that arm?

21 MR. O'CONNOR: Object to the form of
22 the question.

23 THE WITNESS: Because on the prior CT
24 examinations, that strut is almost a horizontal
25 angle outside of the inferior vena cava, and I